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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In Re: ROGER A. STADTMUELLER, Debtor in Possession.	Case No. 17-03545-FPC11 MOTION TO USE PROPERTY OF THE ESTATE and MOTION TO SHORTEN TIME WITH NOTICE - 11 U.S.C. § 363(b)
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Debtor Roger A. Stadtmueller, by and through his attorneys, Winston & Cashatt, Lawyers, by Timothy R. Fischer, hereby moves pursuant to 11 U.S.C. § 363(b) for an order to use property of the estate outside the ordinary course of business. Debtor further moves this Court for an accelerated response period of eight (8) days, plus three (3) days for mailing, under LR 9013-1.

A. USE OF PROPERTY OF THE ESTATE

As part of the process to sell the real property located on Strong Road, the Debtor's real estate agent believes it necessary to make certain minor repairs to the real property so that it can be sold for maximum value and in an expedited

MOTION TO USE PROPERTY OF THE ESTATE and
MOTION TO SHORTEN TIME WITH NOTICE - 1

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1 way. [Decl. of Realtor in Support]. The realtor believes there is approximately
2 \$10,000 to \$15,000 of repairs needed. The Debtor and his realtor have identified
3 repairs that are only absolutely necessary and recommended so that it can go onto
4 the market in early April.
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7 The Debtor respectfully requests that the Court enter an order allowing the
8 Debtor to use up to \$15,000 in estate assets to improve the property for sale.
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11 **B. SHORTENED TIME**
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13 Due to the fact that the Debtor must begin repairs as soon as possible so that
14 the house can get on the market by early April, the Debtor further moves this
15 Court for an accelerated response period of eight (8) days, plus three (3) days for
16 mailing, under LR 9013-1.
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20 DATED this 5th day of March, 2018.
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23 WINSTON & CASHATT, LAWYERS
24 /s/ Timothy R. Fischer
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26 _____
27 Timothy R. Fischer, WSBA No. 40075
28 Attorney for Debtor in Possession
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NOTICE

PLEASE TAKE NOTICE that the debtor has filed with the Court a motion to sell property of the bankruptcy estate as well as a motion to shorten the response period. **Any person or party in interest objecting to the motions must do so by filing a written objection with the Clerk of the US Bankruptcy Court, P.O. Box 2164, Spokane, WA 99210, no later than eight (8) days, plus three (3) days for mailing, from the date of this notice.** If no objection is timely filed, an order may be presented to the Court for approval, ex parte, without further notice.

DATED this 5th day of March, 2018.

WINSTON & CASHATT, LAWYERS

/s/ Timothy R. Fischer

Timothy R. Fischer, WSBA No. 40075
Attorney for Debtor in Possession

MOTION TO USE PROPERTY OF THE ESTATE and
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